

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ClearOne, Inc.,

Plaintiff,

vs.

Shure Incorporated.,

Defendant.

Civil Number 1:19-cv-0241

Jury Trial Demanded

Hon. Nancy L. Maldonado

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Shure Incorporated,

Counter-Plaintiff,

vs.

ClearOne, Inc.,

Counter-Defendant.

**JOINT MOTION FOR DISPOSAL OF ALL SEALED  
ELECTRONICALLY FILED DOCUMENTS**

The parties, by and through their undersigned counsel, hereby respectfully move the Court for an Order directing the Clerk of the Court to dispose of all SEALED documents electronically filed with the Court.

During the course of this litigation, pursuant to Local Rule 26.2 and the terms of the operative Protective Order, each of the documents listed below were electronically filed with a Sealing Motion which was granted by the Court. This litigation has now been dismissed with prejudice (ECF-219). Accordingly, the parties agree that all Sealed documents should be deleted from the Court's record, and hereby jointly request an Order instructing the Clerk of the Court to delete the following materials:

ECF No.	Title of Document
ECF 14	SEALED DOCUMENT by Plaintiff ClearOne, Inc. Complaint for Patent Infringement and Trade Secret Misappropriation (Attachments: # 1 Exhibit A-O)(Leach, Garret) (Entered: 04/18/2019)

ECF No.	Title of Document
ECF 27	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Answer to Complaint (Rademaker, Bradley) (Entered: 06/18/2019)
ECF 42	SEALED DOCUMENT by Plaintiff ClearOne, Inc. Under Seal Version of ClearOne, Inc.'s Memorandum of Law in Support of its Motion for Leave to File First Amended Complaint (Attachments: # 1 Exhibit ClearOne, Inc.'s Proposed First Amended Complaint)(Dixon, Douglas) (Entered: 09/26/2019)
ECF 52	SEALED DOCUMENT by Plaintiff ClearOne, Inc. Under Seal Version of ClearOne's First Amended Complaint (ECF 51) (Dixon, Douglas) (Entered: 12/16/2019)
ECF 54	SEALED DOCUMENT by Plaintiff ClearOne, Inc. Under Seal Version of ClearOne's Corrected First Amended Complaint (ECF 53) (Dixon, Douglas) (Entered: 12/17/2019)
ECF 67	SEAL DOCUMENT by Defendant Shure Incorporated to seal document Shure's Answer to ClearOne's First Amended Complaint (Rademaker, Bradley) Modified on 1/14/2020. (Docket Text Modified by Clerk's Office) (Entered: 01/13/2020)
ECF 80	SEALED DOCUMENT by deponents Tracy A. Bathurst, Ashutosh Pandey Memorandum of Points and Authorities in Support of Motion to Modify Shure Incorporated's Deposition Subpoenas (MISHRA, SOURABH) (Entered: 02/18/2020)
ECF 82	SEALED DOCUMENT by deponents Tracy A. Bathurst, Ashutosh Pandey Memorandum of Sourabh Mishra in Support of Motion to Modify and Supporting Exhibits (MISHRA, SOURABH) (Entered: 02/18/2020)
ECF 92	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Opposition to Deponents' Motion to Modify Deposition Subpoenas (Shih, Charles) (Entered: 03/05/2020)
ECF 93	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Exhibit 1 to Declaration (Shih, Charles) (Entered: 03/05/2020)

ECF No.	Title of Document
ECF 94	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Exhibit 2 to Declaration (Shih, Charles) (Entered: 03/05/2020)
ECF 95	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Exhibit 3 to Declaration (Shih, Charles) (Entered: 03/05/2020)
ECF 96	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Exhibit 7 to declaration (Shih, Charles) (Entered: 03/05/2020)
ECF 113	SEALED DOCUMENT by Plaintiff ClearOne, Inc. Second Amended Complaint (Under Seal Version of ECF 112) (MISHRA, SOURABH) (Entered: 07/30/2020)
ECF 120	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Sealed Answer to ClearOne's Second Amended Complaint (Rademaker, Bradley) (Entered: 08/14/2020)
ECF 124	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Amended Answer to ClearOne SAC (Rademaker, Bradley) (Entered: 08/24/2020)
ECF 129	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Opening Claim Construction Brief (Attachments: # 1 Exhibit B)(Turner, Michael) (Entered: 09/04/2020)
ECF 148	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Memorandum in Support of Motion to Compel (Attachments: # 1 Exhibit 3, # 2 Exhibit 5, # 3 Exhibit 7, # 4 Exhibit 8, # 5 Exhibit 9, # 6 Exhibit 10, # 7 Exhibit 11, # 8 Exhibit 13)(Rademaker, Bradley) (Entered: 12/31/2020)
ECF 152	SEALED DOCUMENT by Plaintiff ClearOne, Inc. (Attachments: # 1 Exhibit J, # 2 Exhibit N, # 3 Exhibit O)(Rayburn, Christina) (Entered: 01/19/2021)

ECF No.	Title of Document
ECF 157	SEALED DOCUMENT by Defendant Shure Incorporated, Counter Claimant Shure Incorporated Reply to ClearOne Opposition to Motion to Compel Production of Documents and Testimony Pertaining to the BMA360 (Campbell, Jr., Thomas) (Entered: 01/26/2021)
ECF 158	SEALED DOCUMENT by Defendant Shure Incorporated, Counter Claimant Shure Incorporated Exhibit 3 to Declaration of Thomas J. Campbell (Campbell, Jr., Thomas) (Entered: 01/26/2021)
ECF 169	SEALED DOCUMENT by Defendant Shure Incorporated Shure's Brief in Support of Motion for Summary Judgment on Trade Secrets Claims (SEALED) (May, Kevin) (Entered: 05/28/2021)
ECF 170	SEALED DOCUMENT by Defendant Shure Incorporated Shure's Statement of Undisputed Material Facts in Support of Motion for Summary Judgment on Trade Secret Claims (SEALED) (May, Kevin) (Entered: 05/28/2021)
ECF 172	SEALED DOCUMENT by Defendant Shure Incorporated Declaration of Andrew S. Fraker in Support of Shure Incorporated's Motion for Summary Judgment (SEALED) (Attachments: # 1 Exhibit A (SEALED), # 2 Exhibit B (SEALED), # 3 Exhibit C (SEALED), # 4 Exhibit D (SEALED), # 5 Exhibit E (SEALED))(May, Kevin) (Entered: 05/28/2021)

ECF No.	Title of Document
ECF 174	<p>SEALED DOCUMENT by Defendant Shure Incorporated Exhibit 1 (SEALED) and Exhibit Nos. 2-48 (SEALED) to the Declaration of Kevin C. May in Support of Shure Incorporated's Motion for Summary Judgment on Trade Secrets Claims (Attachments: # 1 Exhibit 2 (SEALED), # 2 Exhibit 3 (SEALED), # 3 Exhibit 4 (SEALED), # 4 Exhibit 5 (SEALED), # 5 Exhibit 6 (SEALED), # 6 Exhibit 7 (SEALED), # 7 Exhibit 8 (SEALED), # 8 Exhibit 9 (SEALED), # 9 Exhibit 10 (SEALED), # 10 Exhibit 11 (SEALED), # 11 Exhibit 12 (SEALED), # 12 Exhibit 13 (SEALED), # 13 Exhibit 14 (SEALED), # 14 Exhibit 15 (SEALED), # 15 Exhibit 16 (SEALED), # 16 Exhibit 17 (SEALED), # 17 Exhibit 18 (SEALED), # 18 Exhibit 19 (SEALED), # 19 Exhibit 20 (SEALED), # 20 Exhibit 21 (SEALED), # 21 Exhibit 22 (SEALED), # 22 Exhibit 23 (SEALED), # 23 Exhibit 24 (SEALED), # 24 Exhibit 25 (SEALED), # 25 Exhibit 26 (SEALED), # 26 Exhibit 27 (SEALED), # 27 Exhibit 28 (SEALED), # 28 Exhibit 29 (SEALED), # 29 Exhibit 30 (SEALED), # 30 Exhibit 31 (SEALED), # 31 Exhibit 32 (SEALED), # 32 Exhibit 33 (SEALED), # 33 Exhibit 34 (SEALED), # 34 Exhibit 35 (SEALED), # 35 Exhibit 36 (SEALED), # 36 Exhibit 37 (SEALED), # 37 Exhibit 38 (SEALED), # 38 Exhibit 39 (SEALED), # 39 Exhibit 40 (SEALED), # 40 Exhibit 41 (SEALED), # 41 Exhibit 42 (SEALED), # 42 Exhibit 43 (SEALED), # 43 Exhibit 44 (SEALED), # 44 Exhibit 45 (SEALED), # 45 Exhibit 46 (SEALED), # 46 Exhibit 47 (SEALED), # 47 Exhibit 48 (SEALED))(May, Kevin) (Entered: 05/28/2021)</p>
ECF 177	<p>SEALED RESPONSE by ClearOne, Inc. to MOTION by Defendant Shure Incorporated for summary judgment on Trade Secret Claims 166 (Rayburn, Christina) (Entered: 06/25/2021)</p>

ECF No.	Title of Document
ECF 179	SEALED DOCUMENT by Plaintiff ClearOne, Inc. SEALED Exhibits 1-13, 15-16 to Declaration of Christina V. Rayburn ISO Opposition to Shure's MSJ re Trade Secret Claims (Attachments: # 1 Exhibit 1 (SEALED), # 2 Exhibit 2 (SEALED), # 3 Exhibit 3 (SEALED), # 4 Exhibit 4 (SEALED), # 5 Exhibit 5 (SEALED), # 6 Exhibit 6 (SEALED), # 7 Exhibit 7 (SEALED), # 8 Exhibit 8 (SEALED), # 9 Exhibit 9 (SEALED), # 10 Exhibit 10 (SEALED), # 11 Exhibit 11 (SEALED), # 12 Exhibit 12 (SEALED), # 13 Exhibit 13 (SEALED), # 14 Exhibit 15 (SEALED), # 15 Exhibit 16 (SEALED))(Rayburn, Christina) (Entered: 06/25/2021)
ECF 180	SEALED DOCUMENT by Plaintiff ClearOne, Inc. SEALED Exhibits 17-34 to Declaration of Christina V. Rayburn ISO Opposition to Shure's MSJ re Trade Secret Claims (Attachments: # 1 Exhibit 17 (SEALED), # 2 Exhibit 18 (SEALED), # 3 Exhibit 19 (SEALED), # 4 Exhibit 20 (SEALED), # 5 Exhibit 21 (SEALED), # 6 Exhibit 22 (SEALED), # 7 Exhibit 23 (SEALED), # 8 Exhibit 24 (SEALED), # 9 Exhibit 25 (SEALED), # 10 Exhibit 26 (SEALED), # 11 Exhibit 27 (SEALED), # 12 Exhibit 28 (SEALED), # 13 Exhibit 29 (SEALED), # 14 Exhibit 30 (SEALED), # 15 Exhibit 31 (SEALED), # 16 Exhibit 32 (SEALED), # 17 Exhibit 33 (SEALED), # 18 Exhibit 34 (SEALED))(Rayburn, Christina) (Entered: 06/25/2021)
ECF 181	SEALED DOCUMENT by Plaintiff ClearOne, Inc. SEALED Exhibits 35-54 to Declaration of Christina V. Rayburn ISO Opposition to Shure's MSJ re Trade Secret Claims (Attachments: # 1 Exhibit 35 (SEALED), # 2 Exhibit 35 (SEALED), # 3 Exhibit 35 (SEALED), # 4 Exhibit 35 (SEALED), # 5 Exhibit 35 (SEALED), # 6 Exhibit 40 (SEALED), # 7 Exhibit 41 (SEALED), # 8 Exhibit 42 (SEALED), # 9 Exhibit 43 (SEALED), # 10 Exhibit 44 (SEALED), # 11 Exhibit 45 (SEALED), # 12 Exhibit 46 (SEALED), # 13 Exhibit 47 (SEALED), # 14 Exhibit 48 (SEALED), # 15 Exhibit 49 (SEALED), # 16 Exhibit 50 (SEALED), # 17 Exhibit 51 (SEALED), # 18 Exhibit 52 (SEALED), # 19 Exhibit 53 (SEALED), # 20 Exhibit 54 (SEALED))(Rayburn, Christina) (Entered: 06/25/2021)

ECF No.	Title of Document
ECF 182	SEALED DOCUMENT by Plaintiff ClearOne, Inc. Response to Shure's Statement of Undisputed Material Facts in Support of Motion for Summary Judgment on Trade Secrets Claims (Rayburn, Christina) (Entered: 06/25/2021)
ECF 183	SEALED DOCUMENT by Plaintiff ClearOne, Inc. Statement of Additional Material Facts in Support of Opposition to Shure Incorporated's Motion for Summary Judgment (Rayburn, Christina) (Entered: 06/25/2021)
ECF 189	SEALED EXHIBIT by ClearOne, Inc. (Document not scanned) (td, ) (Entered: 06/29/2021)
ECF 196	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Reply in Support of Motion for Summary Judgment (May, Kevin) (Entered: 07/16/2021)
ECF 197	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Response to ClearOne, Inc's Statement of Additional Material Facts (May, Kevin) (Entered: 07/16/2021)
ECF 198	SEALED DOCUMENT by Counter Claimant Shure Incorporated, Defendant Shure Incorporated Exhibits 49 -56 to the Declaration of Kevin May (Attachments: # 1 Exhibit 50, # 2 Exhibit 51, # 3 Exhibit 52, # 4 Exhibit 53, # 5 Exhibit 54, # 6 Exhibit 55, # 7 Exhibit 56)(May, Kevin) (Entered: 07/16/2021)

Dated: February 6, 2023

Respectfully Submitted,  
 By: /s/Douglas J. Dixon  
 Counsel for Defendant  
**CLEARONE, INC.**

John C. Hueston, *pro hac vice*  
 Douglas J. Dixon, *pro hac vice*  
 Christina V. Rayburn, *pro hac vice*  
 Michael K. Acquah, *pro hac vice*  
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Respectfully Submitted,  
 By: /s/ Bradley F. Rademaker  
 Counsel for Defendant  
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**CERTIFICATE OF SERVICE**

I, Bradley Rademaker, hereby certify that on February 6, 2023, the foregoing document was filed electronically through the Court's Electronic Case Filing System. Service of this document is being made upon all counsel of record in this case by the Notice of Electronic Filing issued through the Court's Electronic Case Filing System on this date.

By: /s/Bradley Rademaker